

STRADLEY, RONON, STEVENS & YOUNG, LLP  
A Pennsylvania Limited Liability Partnership  
By: Francis X. Manning  
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Attorneys for Defendant  
Chase Home Finance LLC

UNITED STATES COURT DISTRICT  
FOR THE DISTRICT OF NEW JERSEY  
(CAMDEN VICINAGE)

STACEY COLEMAN, fka Stacey  
Kovilaritch: individually and as a  
class representative on behalf of  
others similarly situated,

Plaintiff,

vs.

CHASE HOME FINANCE, LLC,  
successor-by-merger to CHASE  
MANHATTAN MORTGAGE  
CORP. and John Doe 1-100 and John  
Doe Servicers 1-1-100,

Defendant.

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No. 1:08-cv-02215-NLH-JS

NOTICE OF MOTION TO  
DISMISS COMPLAINT

FILED ELECTRONICALLY  
Return Date: October 6, 2008

TO: Lewis G. Adler, Esquire  
26 Newton Avenue  
Woodbury, NJ 08096

PLEASE TAKE NOTICE that on October 6, 2008, at 9:00 in the forenoon or as soon thereafter as counsel may be heard, defendant Chase Home Finance LLC, through its attorneys, will move before this Court at the Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey 08101, pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Local Rules of the U.S. District Court for the District of New Jersey, for an Order dismissing the Complaint in its entirety, with prejudice.

In support thereof, Defendant relies on and incorporates herein by reference the accompanying Brief and Declaration of Francis X. Manning. A proposed form of Order also is enclosed.

Oral argument is requested if the motion is opposed.

Respectfully submitted,

/s/ Francis X. Manning

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